

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Petition for Waiver of Rules Requiring Support	)	GN Docket No. 15-178
of TTY Technology	)	
	)	

**SECOND REPORT**

On December 29, 2017, the Federal Communications Commission (“FCC” or “Commission”) granted TracFone Wireless, Inc. (“TracFone”) an extended waiver of its requirements to support text telephony (“TTY”) over Internet-Protocol (“IP”)-based wireless services until June 30, 2021.<sup>1</sup> As a condition of the grant, TracFone is required to file a report with the Commission every six months describing its progress toward implementing real-time text (“RTT”).<sup>2</sup> Specifically, the Commission has asked that TracFone “indicate the extent to which RTT solutions are available from its underlying carriers, in addition to providing information on its own progress toward implementing RTT solutions.”<sup>3</sup> TracFone’s first progress report is below.

As the Commission has noted, TracFone is a mobile virtual network operator (“MVNO”) that resells “commercial mobile radio service (CMRS) obtained through agreement[s] with various licensed operators of wireless networks throughout the United States.”<sup>4</sup> MVNOs are in

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<sup>1</sup> *TracFone Wireless, Inc., Petition for Extension of Waiver of Rules Requiring Support of TTY Technology*, Order, 32 FCC Rcd 10470 (2017) (“*TracFone Waiver Order*”).

<sup>2</sup> *TracFone Waiver Order*, ¶ 9.

<sup>3</sup> *TracFone Waiver Order*, ¶ 9 n. 31.

<sup>4</sup> *TracFone Waiver Order*, ¶ 4.

the unique position of being entirely dependent on the solutions implemented by their underlying facilities-based carriers.

The Commission requires that, when implemented, RTT solutions must be interoperable, backward compatible with TTY technology, and capable of supporting certain basic features and capabilities available to users.<sup>5</sup> After consulting with our underlying carriers, we are able to report that they continue to make progress in implementing industry standard RTT solutions to meet the Commission's requirements.<sup>6</sup>

Two of TracFone's underlying carriers are implementing device-based RTT functionalities; while one underlying carrier is presently using an app-based solution that is available in both the Play and App stores.

Our underlying carriers report that interoperability has not presented any challenges and there have been no obstacles to achieving the required backward compatibility.

Finally, our underlying carriers report that they have not encountered any challenges in transmitting emergency information to the correct public safety answering points.

Although the Commission granted TracFone an extended waiver until June 30, 2021 of the Commission's requirements to support TTY technology over IP-based wireless services, TracFone has begun the process of requiring its manufacturers to include the embedded solution in its devices. In the interim, TracFone's Customer Care has the list of current devices with RTT capability and can assist customers that request these handsets.

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<sup>5</sup> *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568, ¶ 26 (2016).

<sup>6</sup> AT&T Services, Inc., Verizon, and T-Mobile USA, Inc., which are the underlying carriers serving 99% of TracFone's customers, provided the information presented in this report.

TracFone will continue to monitor the progress being made by its underlying carriers in their various stages of testing.

Respectfully submitted,

**TRACFONE WIRELESS, INC.**

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